



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMM:SK
F. #2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

February 28, 2015

By FedEx & ECF

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Re: United States v. Philip Kenner & Tommy C. Constantine
Criminal Docket No. 13-607 (JFB)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014, March 6, 2014, March 11, 2014, March 24, 2014, April 11, 2014, May 21, 2014, June 6, 2014, August 6, 2014, August 15, 2014, August 20, 2014, August 22, 2014, August 27, 2014, August 28, 2014, August 29, 2014, September 2, 2014, September 11, 2014, September 12, 2014, September 19, 2014, October 2, 2014, February 20, 2015 and February 25, 2015.

Enclosed please find the following:

- Documents related to Eufora (bates-numbered ED 3238);
- A map of Hawaii (bates-numbered ED 3239);
- Documents related to Mosquito Rojo (bates-numbered MR 1-13);
- A Standard Advisors document (bates-numbered ED 3240-3246);

- An email, text messages, and a photograph from Kenner (bates-numbered DS 860-863);
- A version of the complaint previously disclosed at BINDER 463-471, with exhibits (bates-numbered LIT 88-118); and
- Documents provided by Kenner to the IRS (bates-numbered ED 3247).

The following documents are being provided only to Kenner:

- An FBI report summarizing statements made by Kenner in connection with a separate investigation in Washington D.C., on September 7, 2011; and
- Agent notes reflecting statements made by Kenner and a list provided by Kenner to the IRS in Phoenix, Arizona, in July-September 2012.

Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/Saritha Komatireddy
Saritha Komatireddy
James M. Miskiewicz
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Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)